

**UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA**

IN RE:

Stephen Raymond Abel	:	
Debtor	:	Chapter 13
	:	No: 1:19-bk-05231-HWV
:		
Nationstar Mortgage LLC	:	
d/b/a Mr. Cooper	:	
Movant	:	
:		
MOTION FOR STAY RELIEF		
v.	:	
:		
Stephen Raymond Abel	:	
Respondent	:	

DEBTOR'S ANSWER TO
MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362 FILED
ON BEHALF OF NATIONSTAR MORTGAGE LLC
D/B/A MR. COOPER

Debtor, Stephen Raymond Abel, through his counsel, Tony Sangiamo, Esq., hereby files his Answer to Nationstar Mortgage LLC d/b/a Mr. Cooper Motion for Relief from the Automatic Stay under Section 11 U.S.C. 362 and, avers the following in support of the said Answer:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. It is denied that Debtor has post-petition arrears for January 2020 through March 2020. Debtor's Chapter 13 Plan is a conduit plan.

7. Denied. It is denied that Debtor has post-petition arrears totaling \$2,624.31. The Standing Chapter 13 Trustee has made at least 1 post-petition conduit payment to the Movant since January 2020.
8. Allegation number 8 is a legal conclusion to which no responsive pleading is required.
9. Allegation number 9 is denied as outside Debtor's knowledge; strict proof thereof is demanded.
10. Allegation number 10 is a legal conclusion to which no responsive pleading is required.

WHEREAS, Debtor respectfully requests that the Court deny the relief requested by Movant.

Respectfully Submitted,

Date: April 1, 2020

/s/Tony Sangiamo, Esq.
Tony Sangiamo, Esq.
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Attorney for Debtor